IN THE UNITED STATES COURT OF FEDERAL CLAIMS

(Electronically filed on September 25, 2018)

BOTTOM LINE, INC.,

Plaintiff,

V.

UNITED STATES OF AMERICA,

Defendant.

Defendant.

)

Case No. 15-445 L

Hon. Eric G. Bruggink

JOINT MOTION TO STAY TO FACILITATE SETTLEMENT

Plaintiff Bottom Line, Inc., and Defendant, the United States of America, hereby notify the Court that the parties have entered into settlement discussions and are working toward settlement, and respectfully move this Court to enter an order staying this action.

The parties have been working towards settlement and believe that settlement discussions should continue, and respectfully request that the Court stay this proceeding until December 28, 2018. The parties believe that it may be possible to resolve this case by settlement, and that they are more likely to reach an agreement if the Court temporarily suspends the operative scheduling order, ECF No. 41, to allow for a dedicated period of settlement discussions. The parties propose that they will file a status report on January 11, 2019, to notify the Court of the parties' progress towards settlement.

For the foregoing reasons, the parties respectfully request that the Court stay this proceeding until December 28, 2018.

Dated: September 25, 2018

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MOFFIT & PHILLIPS, PLLC

JEFFREY H. WOOD Acting Assistant Attorney General

By /s/ Brandon K. Moffitt

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By <u>/s/ Carter F. Thurman</u>

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